

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

2016 NOV -8 P 2:50

UNITED STATES OF AMERICA,

JON W. SANFILIPPO
CLERK

Plaintiff,

v.

Case No. 16-CR-
[18 U.S.C. §§ 2339B(a)(1) & 2]

16-CR-175

JASON MICHAEL LUDKE,
a/k/a "Muhammad Nassir,"
a/k/a "Muhammad Abdun Naasir
al-Hannafi,"
a/k/a "Abuz Sayyaf," and

YOSVANY PADILLA-CONDE,
a/k/a "Saadiq Ibn Abbas,"
a/k/a "Saadiq Padilla,"

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Beginning on a date unknown, but no later than September 27, 2016, and continuing through October 6, 2016, in the state and Eastern District of Wisconsin and elsewhere,

JASON MICHAEL LUDKE,
a/k/a "Muhammad Nassir,"
a/k/a "Muhammad Abdun Naasir
al-Hannafi,"
a/k/a "Abuz Sayyaf," and

YOSVANY PADILLA-CONDE,
a/k/a "Saadiq Ibn Abbas,"
a/k/a "Saadiq Padilla,"

did unlawfully and knowingly combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant ("ISIL"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization, that ISIL engages and has engaged in terrorist activity, and that ISIL engages and has engaged in terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on a date unknown, but no later than September 27, 2016, and continuing through October 6, 2016, in the state and Eastern District of Wisconsin and elsewhere,

**JASON MICHAEL LUDKE,
a/k/a "Muhammad Nassir,"
a/k/a "Muhammad Abdun Naasir
al-Hannafi,"
a/k/a "Abuz Sayyaf"**

while being aided and abetted by others known and unknown, did unlawfully and knowingly attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant ("ISIL"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization, that ISIL engages and has engaged in terrorist activity, and that ISIL engages and has engaged in terrorism.

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on a date unknown, but no later than September 27, 2016, and continuing through October 6, 2016, in the state and Eastern District of Wisconsin and elsewhere,

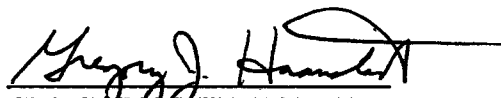
**YOSVANY PADILLA-CONDE,
a/k/a "Saadiq Ibn Abbas,"
a/k/a "Saadiq Padilla,"**

did unlawfully and knowingly aid and abet an attempt by JASON MICHAEL LUDKE, a/k/a "Muhammad Nassir," a/k/a "Muhammad Abdun Naasir al-Hannafi," a/k/a "Abuz Sayyaf," to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b)(1), including but not limited to personnel, to a foreign terrorist organization, namely, the Islamic State of Iraq and the Levant ("ISIL"), which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that ISIL was a designated foreign terrorist organization, that ISIL engages and has engaged in terrorist activity, and that ISIL engages and has engaged in terrorism.

All in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

A TRUE BILL:


Foreperson


GREGORY V. HAANSTAD
United States Attorney